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June 15, 2021

Via Mail and Electronic Mail (Shannon_jones@txs.us.courts.gov)

The Honorable Judge Sam S. Sheldon
United States District Courts
515 Rusk St., 7th floor, Room 7019
Houston, Tx 77002
ATTN: Ms. Shannon Jones, Case Manager

Re: Response to Defendant's Request for Motion to Compel in Baker vs. Lone Star Legal Aid, Civil Case No. 4:20-cv-03870

To the Honorable Judge Sheldon:

I am asking for denial of Defendants', Lone Star Legal Aid, request to File Motion to Compel Discovery Pursuant.

FACTUAL BACKGROUND

In November 2018, Plaintiff received a promotion, raise, and her own office while working for Defendant. In December 2018, Plaintiff began to raise awareness and complain of harassment, racial discrimination, and breaches in her contract (Collective Bargaining Agreement.) In retaliation to her initial complaints, racial slurs were emailed to plaintiff followed soon after with termination. Plaintiff honorably served in the U.S. Air Force before working for defendant is classified as a disabled veteran. Plaintiff had all psychiatric conditions under control until harassment began and is now unable to work while also being subjected to ongoing therapies and medications. Plaintiff has had no record of needing therapy nor psychiatric medication before the retaliated termination. Defendant has admitted in initial interrogatory that the only action taken due to the initial complaint was the termination of plaintiff.

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BASIS FOR DENIAL OF REQUEST

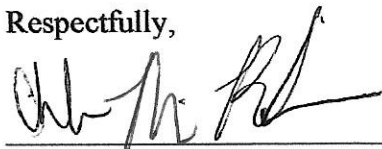
Plaintiff has provided responses to each interrogatory, but does has objections on some requests for production. I summarize the open disputes as follows:

- 1) Plaintiff is in possession of an audio recording. Plaintiff has explained to defendant that it is NOT that I "don't has a desire to," produce the recording in an electronic file, I do not have the capabilities to do so because of the manner in which the recording is stored. Plaintiff has offered alternatives such as playing said recording in a pre-trial meeting or have defendant get recording transcribed.
- 2) Plaintiff has disclosed a list of all therapy appointments, medications, and diagnoses received in connection with allegations. Plaintiff made no such admission that she is withholding additional documentation. Plaintiff is refusing to sign authorization forms for release of medical records due to the nature of intent. Defendant alleges they need field notes of all therapies. Plaintiff believes this an attempt to further harass her since what the defendant is looking for has already been provided. It is an inappropriate request and invasion of plaintiff's privacy. As stated to Defendant, Plaintiff has no objections to providing medical records, but field notes are out of scope. Plaintiff neither confirmed nor denied if psychiatrist, Dr. Parvathy Nair, will be an expert witness. This is hearsay considering defendants noted on February 18, 2021 during Joint Discovery that they plan to settle after depositions and are not anticipating a trial.
- 3) Defendant honed in on veteran benefits received. Plaintiff has no issue disclosing that she received unemployment benefits totaling \$4,410.00 in 2019 following her wrongful termination. Plaintiff will not disclose military benefits because it is not relevant and was not sought nor received based on claims of not being able to work. Defendant has nothing to do with plaintiff obtaining veteran status.

CONCLUSION

It is my request that the Court denies permission to file the intended motion. It is a ploy to demean and further harass the plaintiff.

Respectfully,



Chloe Baker

cc- via mail delivery and electronic mail:

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